

TRULINCS 54001048 - BRENNERMAN, RAHEEM J - Unit: ALF-U-B

FROM: 54001048
TO:
SUBJECT: Re: RELIEF CORRESPONDENCE - PART I
DATE: 03/18/2019 08:36:57 AM

x

Raheem J. Brennerman (54001-048)
LSCI ALLENWOOD
P O Box 1000
White Deer, PA 17887-1000

The Honorable Richard J. Sullivan
United States Circuit Judge
Southern District of New York
40 Foley Square
New York, New York 10007

March 18, 2019

Re: United States v. Brennerman
Case No. 1:17-CR-337-RJS

Dear Judge Sullivan:

Defendant Raheem Brennerman ("Brennerman") respectfully submits this correspondence and appendix in reliance on the relevant Federal Rule, applicable law and the U.S Constitution in seeking relief from the judgment of conviction and sentence, based on the prosecutorial misconduct and deception highlighted below. In the alternative, Brennerman respectfully submits this correspondence in compliance with the relevant parts of The N.Y. Rules of Professional Conduct ("N.Y. Rules"), the Court's Local Rules and all applicable law, in notifying the court of the prosecutorial misconduct.

STANDARD OF REVIEW:

APPLICABLE LAW

Rule 60(b)(6) of the Federal Rules of Civil Procedure (Fed. R. Civ. Pro. 60(b)(6)) states: "A court has the power to revisit prior decisions of its own or of a coordinate court in any circumstance, although as a rule, courts should be loathe to do so in the absence of extraordinary circumstances." *Christianson v. Cold Indus. Corp.*, 486 U.S. 800, 817, 108 S. Ct. 2166 100 L. Ed2d 811 (1988). The law of the case doctrine is a "rule of discretion rather than a limit on authority." *Schneyder v. Smith*, 653 F.3d 313, 331 (3rd Cir. 2011). The law does not act as a bar to re-litigation of previously decided issues, but reflects the court's discretion to not rehear matters. *In re Broadstripe, LLC*, 435 B.R. 245, 255 (Bankr. D. Del. 2010).

The law of case doctrine is not a rule of jurisdiction limitation, but rather a rule of caution towards disrupting the finality of judgments. *In re Engel*, 124 F. 3d 567, 583 (3rd Cir. 1997) ("the law of the case doctrine does not impose a strait-jacket on the court's ability to reconsider issues previously decided. The doctrine simply "directs a court's discretion, it does not limit the tribunal's power.") (quoting *Arizona v. California*, 460 U.S. 605, 618, 103 S. Ct. 1382, 75 L. Ed 2d 318 (1983)).

Well-Settled Law in the Second Circuit reads: A defendant bears a substantial burden in seeking reversal on the ground that the prosecutors argument to the jury constituted prosecutorial misconduct. See e.g., *United States v. Young*, 470 U.S. 1, 11-12, 84 L. Ed 2d 1, 105 S. Ct 1038 (1985); *United States v. Millar*, 79 F.3d 338, 343 (2d Cir. 1996). In order to obtain reversal of a conviction on the ground that the prosecutor has crossed the boundary between permissible and impermissible argument, the defendant must show that the improper argument caused him substantial prejudice. See., e.g., *United States v. Walker*, 835 F.2d 983, 988 (2d Cir. 1987); *United States v. Modica*, 663 F.2d 1173, 1184 (2d Cir. 1981) (per curiam), cert denied, 456 U.S. 989, 73 L. Ed 1284, 102 S Ct. 2269 (1982). To determine whether the defendant suffered such prejudice, the court considers the seriousness of the misconduct, the measures adopted by the trial court to cure the misconduct, and the certainty of conviction absent the improper statements, See e.g., *United States v. Millar*, 79 F. 3d at 343; *United States v. Walker*, 835 F. 2d at 988; *United States v. Modica*, 553 F.2d at 1181.

As long as *Mooney v. Holohan*, 294 US 103, 112, 79 L Ed 791, 55 S Ct 340, 98 ALR 406 (1935), the court made clear that deliberate deception of a court and jurors by the presentation of known false evidence is incompatible with "rudimentary demands of justice." This was reaffirmed in *Pyle v. Kansas*, 317 US 213, 87 L ED 214, 63 S Ct 177 (1942). In *Napue v. Illinois*, 360 US 264, 3 L Ed 2d 1217, 79 S Ct 1173 (1959), the court said, "[t]he same result obtains when the State, although not soliciting false evidence, allows it to go uncorrected when it appears." *id.*, at 269, 3 L Ed 2d at 1221.

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GOVERNING RULES & PROCEDURE

The N.Y. Rules of Professional Conduct ("N.Y. Rules") provides in relevant parts that "A lawyer shall not knowingly: (1) make a false statement of fact or law to a tribunal or fail to correct a false statement of material fact or law previously made to the tribunal by the lawyer...."(See. Rule 3.3(a)(1))

The Court's Local Rules reads in relevant parts: "In connection with activities in this Court, any attorney is found to have engaged in conduct violative of the New York Rules of Professional Conduct as adopted from time to time by the Appellate Divisions of the State of New York. In interpreting the Code, in the absence of binding authority from the United States Supreme Court or the United States Court of Appeals for the Second Circuit, this Court, in the interest of comity and predictability, will give due regard to decisions of the New York Court of Appeals and other New York State courts, absent significant federal interests."

DISCUSSION

I. Counts 1 (Conspiracy to commit bank fraud) & 2 (bank fraud) of the indictment charged Brennerman in relevant parts with "Brennerman's Scheme to obtain money from financial institutions through fraud" and stated in relevant parts "Brennerman made false representation to financial institutions in the course of seeking loans and other forms of financing for purported business ventures. When Brennerman successfully obtained money from these financial institutions, he and his co-conspirators misappropriated virtually all of the funds for personal expenses"

At trial, Brennerman was convicted for obtaining wealth management perks. And the prosecution argued "Brennerman made misrepresentation to Scott Stout to obtain perks including.....American Express "Platinum" card "[a]s a Morgan Stanley perks. And among other things Morgan Stanley paying the annual fee associated with the card if expenditure using the card exceeded \$100,000 annually, "[n]o foreign associated fees," and a "20% Travel Bonus." And argued in their [Prosecution] opposition motion to Brennerman's post-trial Rule 29 motion of the Federal Rules of Criminal Procedure (see Doc. No. 149) that "Stout established that these misrepresentation were material to Morgan Stanley Private Bank (emphasis added) because the impacted his decision about how to handle the client relationship with Brennerman and what benefits to try to extend to Brennerman (Tr. 720, 722, 727)." At the hearing on November 19, 2019 when the court denied Brennerman's post-trial Rule 29 motion, the court promulgated the theory of the bank fraud in determining the estimated value of the wealth management perks alleged to have been obtained by Brennerman at US\$6,500 which was agreed (in concurrence) by Scott Tulman (appointed counsel for Brennerman).

Based on the theory of the bank fraud, Government presented evidence - GX1-57; GX1-57A; GX529; GX1-73 - the wealth management account opening forms, the e-mail communications with Scott Stout, the wealth management account statement all of which clearly demonstrated that the account was opened at Morgan Stanley Smith Barney LLC and that Scott Stout worked at Morgan Stanley Smith Barney LLC (which was clearly confirmed within GX1-73, notice to recipient, which informed the recipient that the e-mail was from an employee of Morgan Stanley Smith Barney LLC)

Notwithstanding the overwhelming evidence adduced by Government at trial which clearly demonstrated that Brennerman's wealth management account was held at Morgan Stanley Smith Barney LLC. Within a few days after such presentment of the evidence - GX1-57; GX1-57A; GX1-73; GX529 to the court and jury, the prosecution surreptitiously adduced FDIC certificates of unrelated institutions with similar names - Morgan Stanley Private Bank NA and Morgan Stanley Bank NA at Government Exhibit - GX530; 532 and then argued that Brennerman's wealth management accounts were held at Morgan Stanley Private Bank NA in an effort to falsely satisfy the essential element necessary to convict for the charged crime. A true copy of Government Exhibits - GX1-57; GX1-57A; GX1-73; GX529; GX530; GX532 are appended as "Exhibit 1"

II. Count 1 (Conspiracy to commit wire fraud) and Count 3 (wire fraud) of the charged indictment was on the basis of the bridge loan finance between Blacksands and ICBC London. Prior to trial, the prosecution insisted on not reviewing the pertinent ICBC London record/files, then Brennerman was deprived of the pertinent evidence: the complete ICBC London records/files including the lending and underwriting files which he required to disprove MATERIALITY an essential element of the charged crime and to challenge the Government sole witness from ICBC London, Julian Madgett as to substance and credibility of the issues at trial.

Considering the deception by the prosecution already highlighted above, particularly with the prosecution ignoring other Government Exhibits - GX1-19 (See Doc. No. 202, Exhibit B) and GX1-22 (See Doc. 202, Exhibit C) at trial which contradicted the uncorroborated testimony presented and highlighted that Blacksands and ICBC London discussed that \$5 million from the \$20 million bridge finance would be utilized to replace expenses already incurred specifically the \$6.45 million paid as an

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interest fee. Also that Brennerman expressly wrote to inform ICBC, a sophisticated lender, "that (the) group financial statement was not part of the initial discussion or the basis for which the deal (finance) and finance interest was agreed." Further, with Brennerman expressly stating at page 4 of Government Exhibit 1-22 that "as discussed and agreed the bridge finance facility will be provided with \$15 million on escrow and the \$5 million released."

Highlighting that these e-mails exchanges GX1-19 and GX1-22, in the absence of the pertinent records/files, one week prior to the approval of the bridge finance loan by ICBC London reflects the terms, conditions and understanding upon which the bridge financing was agreed. On November 14, 2013, when Mr. Julian Madgett, sent an e-mail attaching written confirmation that the bridge finance loan has been approved, it noted that the loan has an increased interest rate precisely because the bank had agreed to it without taking any other group activities, financial, operations or any other information into consideration. (See Exhibit D at Doc. No. 202)

However the prosecution ignored the overwhelming demonstrable evidence in their possession and instead continued to deceive the jury by adducing uncorroborated testimony of their sole witness from ICBC London, Julian Madgett even when evidence highlighted above which were in their possession contradicted his uncorroborated testimony.

III. Count 4 of the charged indictment, alleged inter alia that Brennerman misrepresented his name, national origins etc, then argued to the jury at trial that Brennerman misrepresented his name and place of birth in an effort to falsely satisfy the essential element necessary to convict. However, review of the trial transcript highlights that the prosecution failed to inform or present to the court and jury that they [prosecution] were in possession of Brennerman's birth certificate which corroborated Brennerman's assertion and contradicted the prosecution's proffer to the court and jury at trial.

The presentation of Brennerman's birth certificate in the prosecution possession at time of trial would have created at least a reasonable doubt, however the jury were deprived on the opportunity to consider that evidence and make determination of the facts themselves.

In analyzing the totality of the prosecutorial misconduct, a reasonable person would conclude that Brennerman was substantially prejudiced. First the prosecution deceived the court and jury through fraudulent presentation of FDIC certificates from unrelated financial institutions to obfuscate the truth. Then Brennerman was deprived of the pertinent evidence required to challenge the uncorroborated testimony of Government sole witness and disprove an essential element - MATERIALITY. These prejudice were exacerbated by the prosecution withholding Brennerman's birth certificate in their possession which disproves their argument at trial.

TRULINCS 54001048 - BRENNERMAN, RAHEEM J - Unit: ALF-U-B

FROM: 54001048

TO:

SUBJECT: Re: RELIEF CORRESPONDENCE - PART II

DATE: 03/18/2019 08:37:02 AM

During the hearing on November 19, 2018, the court promulgated the erroneous argument by the prosecution that Brennerman had misrepresented his status in the United Kingdom in reference to his prior bail application at (Doc. No. 144) where Brennerman stated that the prosecution failed to highlight how having a United Kingdom citizenship will make him more of a flight risk. The court then went on to state that such assertion by Brennerman warranted several enhancement of the sentencing guideline.

This clearly demonstrate substantial prejudice, because the prosecution were in possession of Brennerman's United Kingdom birth certificate, United Kingdom passports (issued in his birth name - Raheem Jefferson Brennerman and a second passport issues in the incorrect order of forenames - Jefferson Raheem Brennerman) and a letter from the United Kingdom Passport Agency dated in June 2012, confirming that the agency had incorrectly issued the second passport in the incorrect order of forenames. All of which corroborated Brennerman's assertions contained within his prior bail application at (Doc. No. 144) and the application which was the subject of the charged crime. The deception of the court and jury by withholding the birth certificate (so as to falsely satisfy the essential element necessary to convict for the charged crime) not only prejudiced Brennerman at trial because the jury were not allowed to consider that evidence in making determination of the overall arguments and presentment, but even at sentencing the prejudice already suffered continued to be exacerbated through the sentencing enhancement highlighted above. Thus, a rational fact-finder will conclude that Brennerman suffered significant prejudice stemming from the prosecutorial misconduct.

A true copy of Brennerman's United Kingdom passports and copy of the letter from the United Kingdom passport agency is appended as "Exhibit 2" (Note: Exhibit 2 evidence is provided in confidence. It should not be publicly docketed as it is confidential and contains privileged information). The prosecution can provide a copy of Brennerman's United Kingdom birth certificate which was submitted to USCIS and in their [prosecution] possession.

In summation, the substantial prejudice suffered by Brennerman is clear and demonstrable. Absent the fraudulent FDIC certificate (even ignoring the constructive amendment of the indictment issue), the deprivation of pertinent evidence: the complete ICBC London records/files and the withholding of his birth certificate to disprove the prosecution theory and create reasonable doubt. Brennerman would have been acquitted on all charged crime of the indictment. Moreover the deception by prosecutors tainted the jury verdict on each count, thus Brennerman seeks relief from the judgment of conviction and sentence or in the alternative Brennerman submits the prosecutorial misconduct to the court in compliance with the N.Y. Rules of Professional Conduct, the Court's local Rules and the New York Bar Association Professional Code of Conduct.

The egregious endeavors (deception of the court and jury) and prosecutorial misconduct renders the entire proceeding fundamentally defective, the guilty verdict on each count tainted and the conviction and sentence a manifest injustice.

RELIEF SOUGHT

For all the foregoing, Defendant Raheem Brennerman, respectfully submits the above in seeking prayer for relief. And in the alternative to notify the court of the prosecutorial misconduct.

Dated: March 18, 2019

White Deer, PA 17887-1000

RESPECTFULLY SUBMITTED

/s/ Raheem J. Brennerman
Defendant

LSCI ALLENWOOD
P O Box 1000
White Deer, PA 17887-1000

TRULINCS 54001048 - BRENNERMAN, RAHEEM J - Unit: ALF-U-B

FROM: 54001048

TO:

SUBJECT: Re: EXHIBIT 1

DATE: 03/16/2019 01:23:15 PM

XXXXXXXXXXXXXXXXXXXXXXXXXXXX

EXHIBIT 1

XXXXXXXXXXXXXXXXXXXXXXXXXXXX

From: BRENNERMAN, R. J @The Executive Office
To: Stout, Scott
Cc: BRENNERMAN R. J@Executive Office
Subject: Re: Morgan Stanley (Wealth Management)
Date: Tuesday, January 8, 2013 9:09:49 AM
Attachments: Morgan Stanley (Client Profile).pdf
Importance: High

Dear Scott,

As discussed, attached is the completed forms, as advised the account will be in the corporate name however you wanted me to also complete a form with personal information. As discussed, I will require Debit Card and AMEX card with the account.

Please let know what are the next steps.

Best Regards

From: Stout, Scott
Sent: Monday, December 10, 2012 1:10 PM
To: mailto:rbrennerman@blacksandspacific.com
Subject: RE: 2013 Preparation

Hi RJ,

Just a reminder to get those forms to me so I can get everything in order prior to our lunch on Friday.

Thanks,
Scott

Scott Stout
F.A. - Wealth Management
Morgan Stanley
Direct: 310 205 4912
9665 Wilshire Blvd., 6th Floor
Beverly Hills, CA 90212

<http://www.morganstanley.com/fa/scott.stout>
scott.stout@morganstanley.com

GOVERNMENT
EXHIBIT
1-57
17 Cr. 337 (RJS)

9665 Wilshire Boulevard
Suite 600 Beverly Hills, CA 90212

Morgan Stanley
Smith Barney

Kindly provide all personal information.
For additional owners, please complete a 2nd profile.

Full Name RATHEM JEFFERSON BRENNERMAN
Address 245 PARK AVENUE, 37FL
City NEW YORK State NEW YORK Zip Code 10167
Home Phone _____ Business _____
Cell 917 699 6430 Fax 310 861 1057
SS# or Tax ID [REDACTED] US Citizen ☒ Y ☐ N
Marital Status SINGLE #of Dependents N/A Date of Birth 04/21/78
E-mail Address rbrennerman@blacksandspacific.com
Telephone access Prompts _____ Mother's Maiden Name _____
City of Birth _____ or 1st School Attended DWIGHT
Employer BLACKSANDS PACIFIC ENERGY CORPORATION
Nature of Business OIL & GAS Occupation OIL & GAS EXECUTIVE
Est. Annual Compensation \$ 720,000 (BASE SALARY) Employed Since 2010

Primary Source of Income-Check all that apply

Annual Salary ☒ Investments ☒ Retirement Assets _____ Amount \$ _____
Est. Total Annual Income (all sources) _____
Est. Liquid Net Worth \$ 45m Est. Total Net Worth \$ _____
Tax Bracket (percentile) _____

Investment Objectives: (Please rank 1 through 4, in order of priority)

Growth 1X Current Income 3 Tax Deferral 4 Liquidity 2
Investing Since (year) _____ Stocks 99 Bonds 99 Commodities 01 Options 02
Risk Tolerance (check one) Aggressive _____ Moderate ☒ X Conservative _____
Speculation Yes _____ No _____

Primary Financial Need: (circle one)

Wealth Accumulation Major Purchase Healthcare Education
Estate Planning Retirement Charity Income

Outside Investments: _____ Firms Used: _____
Equities \$ _____ Fixed Income \$ _____ Cash \$ _____ Alt Investments _____
Time Horizon _____ Liquidity Needs _____

Are you or anyone in your household a major share holder in a publicly traded company? Y ☒ N
Are you an executive of a publicly traded company? Y ☒ N
Do you or anyone in your immediate family work for a brokerage house? Y ☒ N
Is anyone in your immediate family employed by CitiGroup? Y ☒ N

[Signature] 1/5/13

Please sign and date above

In order to open your account we are required to obtain this information. Thank you for assisting us.

THIS INFORMATION WILL REMAIN CONFIDENTIAL 02/2012

GOVERNMENT
EXHIBIT
1-57A
17 Cr. 337 (RJS)

9665 Wilshire Boulevard
Suite 600 Beverly Hills, CA 90212

Morgan Stanley
Smith Barney

Kindly provide all personal information.
For additional owners, please complete a 2nd profile.

Full Name JEFFERSON III HOLDINGS LLC
Address 3960 HOWARD HUGHES PARKWAY, SUITE 500
City LAS VEGAS State NEVADA Zip Code 89169
Home Phone _____ Business _____
Cell 717699 6430 Fax _____
SS# or Tax ID [REDACTED] US Citizen ☒ Y ☐ N
Marital Status N/A # of Dependents _____ Date of Birth _____
E-mail Address _____
Telephone access Prompts _____ Mother's Maiden Name _____
City of Birth _____ or 1st School Attended DWIGHT
Employer _____
Nature of Business INVESTMENTS Occupation _____
Est. Annual Compensation \$ _____ Employed Since _____

Primary Source of Income-Check all that apply

Annual Salary _____ Investments _____ Retirement Assets _____ Amount \$ _____
Est. Total Annual Income (all sources) _____
Est. Liquid Net Worth \$ _____ Est. Total Net Worth \$ _____
Tax Bracket (percentile) _____

Investment Objectives: (Please rank 1 through 4, in order of priority)

Growth 1 Current Income 2 Tax Deferral 3 Liquidity 4
Investing Since (year) _____ Stocks 99 Bonds 99 Commodities 01 Options 02
Risk Tolerance (check one) Aggressive _____ Moderate ☒ X Conservative _____
Speculation Yes _____ No _____

Primary Financial Need: (circle one)

Wealth Accumulation	Major Purchase	Healthcare	Education
<u>Estate Planning</u>	Retirement	Charity	Income

Outside Investments: _____ Firms Used: _____
Equities \$ _____ Fixed Income \$ _____ Cash \$ _____ Alt Investments _____
Time Horizon _____ Liquidity Needs _____

Are you or anyone in your household a major share holder in a publicly traded company? Y N
Are you an executive of a publicly traded company? Y N
Do you or anyone in your immediate family work for a brokerage house? Y N
Is anyone in your immediate family employed by CitiGroup? Y N

RB 1/5/13
Please sign and date above

In order to open your account we are required to obtain this information. Thank you for assisting us.

THIS INFORMATION WILL REMAIN CONFIDENTIAL 02/2012

Morgan Stanley

CLIENT STATEMENT For the Period January 31, 2013

#BWNJGWM

RAHEEM JEFFERSON BRENNERMAN
245 PARK AVENUE
39 FLOOR
NEW YORK NY 10167-4000

Your Branch

9665 WILSHIRE BLVD STE 600
BEVERLY HILLS, CA 90212
Telephone: 310-285-2600
Alt. Phone: 800-458-9838
Fax: 310-285-2696

Client Interaction Center

800-869-3326
24 Hours a Day, 7 Days a Week

Access your accounts online
www.morganstanley.com/online

TOTAL VALUE LAST PERIOD (as of 12/31/12)	<input type="checkbox"/>
NET CREDITS/DEBITS	200,000.00
CHANGE IN VALUE	0.88
TOTAL VALUE OF YOUR ACCOUNT (as of 1/31/13)	\$200,000.88
<small>(Total Values include accrued interest)</small>	

Your Financial Advisor

Scott Stout

GOVERNMENT
EXHIBIT
529
17 C. 337 (RJS)

Morgan Stanley Smith Barney LLC, Member SIPC.

197 - 012515 - 054 - 1 - 0

From: BRENNERMAN, R. J @The Executive Office
To: Stout, Scott
Cc: Gevarter, Mona
Subject: Re: Platinum AMEX
Date: Wednesday, January 9, 2013 7:24:39 PM
Importance: High

Dear Mona,

Are you able to call me on my cellphone 917 699 6430 regarding the email below

Best Regards

From: Stout, Scott
Sent: Wednesday, January 09, 2013 4:45 PM
To: mailto:rbrennerman@blacksandspacific.com
Cc: Gevarter, Mona
Subject: Platinum AMEX

RJ,

Please give Mona a call to set up your Platinum AMEX card. 310 205 4751.

As a Morgan Stanley perk, if you spend \$100k annually we deposit \$500 into your account to cover your annual fee (\$450).

Other MS/Platinum Perks Include:

- First Class Lounge Access
- \$200 annually in airline fee credits (checking bags, etc)
- No foreign transaction fees
- Premium upgrades for car rentals
- Concierge
- 20% Travel Bonus

Scott Stout

F.A. - Wealth Management

MorganStanley

Direct: 310 205 4912

9665 Wilshire Blvd., 6th Floor
Beverly Hills, CA 90212

<http://www.morganstanley.com/fa/scott.stout>
scott.stout@morganstanley.com

Important Notice to Recipients:

**GOVERNMENT
EXHIBIT
1-73
17 Cr. 337 (RJS)**

Please do not use e-mail to request, authorize or effect the purchase or sale of any security or commodity. Unfortunately, we cannot execute such instructions provided in e-mail. Thank you.

The sender of this e-mail is an employee of Morgan Stanley Smith Barney LLC ("Morgan Stanley"). If you have received this communication in error, please destroy all electronic and paper copies and notify the sender immediately. Erroneous transmission is not intended to waive confidentiality or privilege. Morgan Stanley reserves the right, to the extent permitted under applicable law, to monitor electronic communications. This message is subject to terms available at the following link: <http://www.morganstanley.com/disclaimers/mssbemail.html>. If you cannot access this link, please notify us by reply message and we will send the contents to you. By messaging with Morgan Stanley you consent to the foregoing.



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MEDVECTOR
Transforming Clinical Trials**Scott Stout • 3rd**CEO, Co-Founder at MedVector Clinical Trials
El Segundo, California

Message



MedVector Clipical Trials

University of Arizona

See contact info

500+ connections

MedVector's mission is to advance medicine by streamlining the clinical trial industry. We provide Pharmaceutical & Biotech companies, Contract Research Organizations (CRO) and research institutes a global patient network, which enables them to quickly identify clinical trial candidates, exponentially im...

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Experience**CEO & Co-Founder**

MedVector Clinical Trials

Jun 2017 – Present • 1 yr 1 mo

El Segundo, CA

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Once suitable candidates have been identified, MedVector connects our research clients to trial participants utilizing a state of the art, HIPAA compliant, telemedicine network, allowing them to virtually move patients to clinical trial site-locations from anywhere in the world.

Our process allows clinical trial sites (locations) to capture marketshare, creates economies-of-scale by removing redundancies in the current marketplace, creates revenue for hospitals not conducting clinical trials, gives remote populations access to cutting edge medicine, and significantly expedites the process of bringing life saving, advanced medicine to market.

To learn more visit: www.MedVectorTrials.com

Is

Fargo

Private

Bank

Financial Advisor

Wells Fargo Private Bank

Oct 2014 – Apr 2018 • 3 yrs 7 mos

Los Angeles, California

Built a Wealth Management team within the Private Bank, incorporating Wealth Managers, Portfolio Managers, Private Bankers and Financial Advisors.



Stanley

Wealth

Financial Advisor

Morgan Stanley Wealth Management

May 2011 – Nov 2014 • 3 yrs 7 mos

Beverly Hills

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Financial Advisor, Mutual of Omaha Financial Advisors**Todd Lubin • 2nd**
Financial Advisor at Morgan Stanley**Seth Deitchman • 3rd**
Financial Advisor at Morgan Stanley

Investment D & S Investments
s Jan 2008 – May 2011 • 3 yrs 5 mos
Advised a Family Office regarding options strategy.

Education

University of Arizona
Bachelor of Science (BS), Marketing
1997 – 2002
Activities and Societies: Delta Chi





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Scott Stout • 3rd

CEO, Co-Founder at MedVector Clinical Trials
El Segundo, California

InMail



MedVector Clinical Trials

University of Arizona

See contact info

500+ connections

MedVector's mission is to advance medicine by streamlining the clinical trial industry. We provide Pharmaceutical & Biotech companies, Contract Research Organizations (CRO) and research institutes a global patient network, which enables them to quickly identify clinical trial candidates, exponentially improving time to market.

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Experience

CEO & Co-Founder



MedVector Clinical Trials

Jun 2017 – Present • 1 yr 1 mo

El Segundo, CA

MedVector's mission is to advance medicine by streamlining the clinical trial industry. We provide Pharmaceutical & Biotech companies, Contract Research Organizations (CRO) and research institutes a global patient network utilizing Telemedicine. This enables researchers to quickly identify and connect to more clinical trial candidates, exponentially improving time to market.

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To learn more visit: www.MedVectorTrials.com

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Promoted



A Board Position for You
These companies need board members. Click here to be matched with them.



Google Data Studio (beta)
See All Your Marketing Data in
Beautiful, Shareable Reports.
For Free.



Become a Social Worker
Earn Your MSW Online from
USC. No GRE Required.





Built a Wealth Management team within the Private Bank, incorporating Wealth Managers, Portfolio Managers, Private Bankers and Financial Advisors.

**Financial Advisor**

Morgan Stanley Wealth Management

May 2011 – Nov 2014 • 3 yrs 7 mos

Beverly Hills

Options Trader

D & S Investments

Jan 2008 – May 2011 • 3 yrs 5 mos

Advised a Family Office regarding options strategy.

Education

**University of Arizona**

Bachelor of Science (BS), Marketing

1997 – 2002

Activities and Societies: Delta Chi

Interests

**University of Arizona**

214,411 followers

**MedVector Clinical Trials**

4 followers

**University of Arizona Alumni**

34,140 members

**Barrington Legal, Inc.**

40 followers

**Delta Chi Fraternity**

5,471 members

**Fortis Partners**

1,045 followers

[See all](#)

Morgan Stanley Smith Barney is Now Morgan Stanley Wealth Management

Sep 25, 2012

Morgan Stanley's U.S. Wealth Management Business Has a
New Name Following Largest-Ever Integration in the Wealth
Management Industry

New York —

Morgan Stanley (NYSE: MS) today announced that its U.S. wealth management business, Morgan Stanley Smith Barney, has been renamed Morgan Stanley Wealth Management (MSWM).

Morgan Stanley Wealth Management is an industry leader, managing \$1.7 trillion in client assets through a network of 17,000 representatives in 740 locations. Morgan Stanley on September 11 announced an agreement with Citigroup to increase its majority ownership of MSWM such that Morgan Stanley will assume full control by June of 2015, subject to regulatory approval. The business was formed in 2009 as a joint venture between Morgan Stanley and Citi's Smith Barney.

"Today, as we move under one name, we are culminating a three-year effort to integrate two outstanding franchises," said James Gorman, Chairman and Chief Executive Officer of Morgan Stanley. "The Smith Barney name stood for investment excellence for three-quarters of a century, and Morgan Stanley Wealth Management will provide the first-class service that has distinguished Morgan Stanley as a firm for more than 75 years. Going forward, we remain focused on being the world's premier wealth management group."

Said Greg Fleming, President of Morgan Stanley Wealth Management, "Today, we are one integrated business, with one overarching mission: to earn the trust of our clients every day

through superior advice and execution. Our name has changed to reflect our integration, but our mission remains the same: We are committed to helping our clients reach their financial goals."

The broker-dealer designation for Morgan Stanley Wealth Management will remain "Morgan Stanley Smith Barney LLC."

Morgan Stanley Wealth Management, a global leader in wealth management, provides access to a wide range of products and services to individuals, businesses and institutions, including brokerage and investment advisory services, financial and wealth planning, credit and lending, cash management, annuities and insurance, retirement and trust services.

Morgan Stanley (NYSE: MS) is a leading global financial services firm providing a wide range of investment banking, securities, investment management and wealth management services. The Firm's employees serve clients worldwide including corporations, governments, institutions and individuals from more than 1,200 offices in 43 countries. For further information about Morgan Stanley, please visit www.morganstanley.com.

Media Relations Contact:

Jeanmarie McFadden, 212.761.2433

Jim Wiggins, 914.225.6161

DUPLICATE

FEDERAL DEPOSIT INSURANCE CORPORATION
WASHINGTON, D. C.

Hereby certifies that the deposits of each depositor in

FEDERAL
MORGAN STANLEY PRIVATE BANK,
NATIONAL ASSOCIATION
PURCHASE
NEW YORK
are insured to the maximum amount provided by the
Federal Deposit Insurance Act



Attest: *Robert L. Allen*
EXECUTIVE SECRETARY

No. 34221

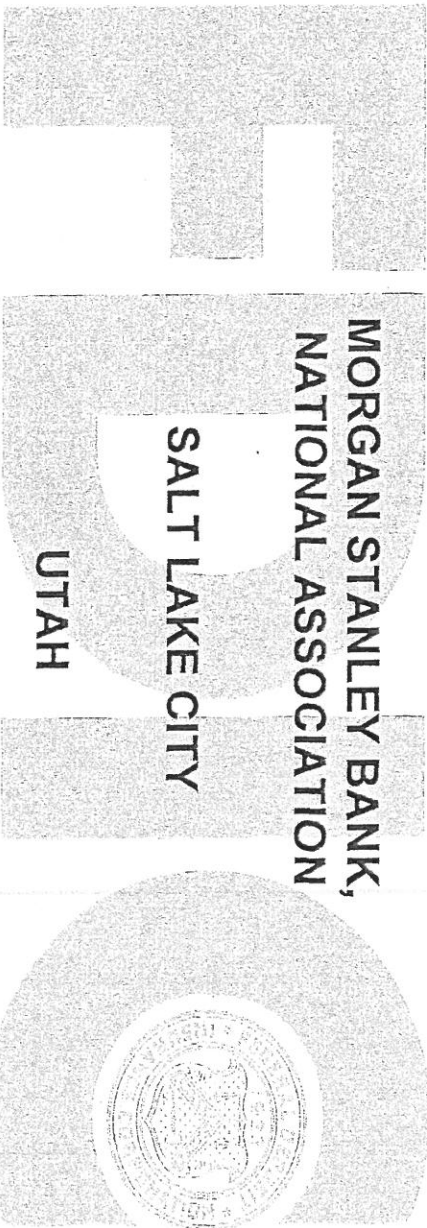
In testimony whereof, witness my signature and the seal of the
Corporation this 1ST day of JULY, 2010

Shelia C. Davis
CHAIRMAN OF THE BOARD OF DIRECTORS

DUPLICATE

FEDERAL DEPOSIT INSURANCE CORPORATION
WASHINGTON, D. C.

Hereby certifies that the deposits of each depositor in



are insured to the maximum amount provided by the
Federal Deposit Insurance Act



Attest: *Robert L. Galloway*
EXECUTIVE SECRETARY

No: 32992

In testimony whereof, witness my signature and the seal of the
Corporation this 23RD day of SEPTEMBER, 2008

Shelia C. Davis
CHAIRMAN OF THE BOARD OF DIRECTORS

TRULINCS 54001048 - BRENNERMAN, RAHEEM J - Unit: ALF-U-B

FROM: 54001048

TO:

SUBJECT: Re: EXHIBIT 2

DATE: 03/16/2019 01:23:04 PM

XX

EXHIBIT 2

DO NOT DOCKET

NOTE:

The documents/evidence contained within this exhibit is confidential and privileged. It is provided in confidence and should not be disseminated or docketed publicly without the expressed consent of Raheem Jefferson Brennerman which is expressly reserved.

Written by:

Raheem J. Brennerman

XX

Request to Return Current Passport for Cancellation v1:2



Aragon Court
Northminster Road
Peterborough
Cambridgeshire
PE1 1QG

Tel (01733) 888630

Fax (01733) 888142

Date 19th June 2012

Mr Raheem J Brennerman
[REDACTED]

LONDON
[REDACTED]

Our ref: Passport no: [REDACTED] Application no: 226922537

Dear Mr Raheem,

We refer to a second passport that we have recently issued you with.

During an audit we have become aware that this passport has been issued incorrectly and will need to be reissued to reflect your correct order of forenames.

We request that in the meantime you avoid using this passport for travel as it may cause difficulties at some ports of entry.

We would be most grateful if you would call our office at your earliest opportunity.

The Counter
Aragon Court
Northminster Road
Peterborough
Cambridgeshire
PE1 1QG
01733 888630

Please Note: The above passport may be automatically cancelled if you do not return it with this letter to the above address within three calendar months and will no longer be valid for travel.

Yours sincerely

Mr. Amarjit S Nanuwa

For advice on how and where to obtain a passport,
call the Passport Adviceline on **0870 521 0410**
(24 hours a day, 7 days a week).

You can also email hqenquiries@ips.gsi.gov.uk
or visit www.ips.gov.uk



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CUSTOMER SERVICE EXCELLENCE